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10 Attorneys for
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MRT ASSETS, LLC, a Nevada limited
liability company,

Plaintiffs,

vs.
NATIONSTAR MORTGAGE, LLC a form
and type of entity unknown, SUMMER
ALLGOOD; GUILD MORTGAGE
COMPANY, a California Corporation;
DOES I through X, inclusive

Case No.: 2: 17-cv-00070-JCM-CWH

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND THE DEADLINE
FOR SUMMER ALLGOOD AND GUILD
MORTGAGE COMPANY TO TAKE
THE DEPOSITIONS OF NATIONSTAR
MORTGAGE, LLC, AND FEDERAL
HOME LOAN MORTGAGE
CORPORATION PER FED. R. CIV. P.
30(B)(6)**

SUMMER ALLGOOD, an individual; and
GUILD MORTGAGE COMPANY, a
California Corporation,

Counterclaimants,

vs.
MRT ASSETS, LLC, a Nevada limited
liability company,

Counterdefendant.

SUMMER ALLGOOD, an individual; and

1 GUILD MORTGAGE COMPANY, a
2 California Corporation,

3 Crossclaimant,

4 vs.

5 NATIONSTAR MORTGAGE, LLC,

6 Crossdefendant.
7

8 SUMMER ALLGOOD, an individual; and
9 GUILD MORTGAGE COMPANY, a
California Corporation,

10 Third-Party Plaintiff,

11 vs.

12 FEDERAL HOME LOAN MORTGAGE
13 CORPORATION, a federally chartered
corporation,

14 Third-Party Defendant.
15

16 Comes now Defendants/Counterclaimants/Crossclaimant/Third-Party Plaintiff, Summer
17 Allgood (“Allgood”) and Guild Mortgage Company (“Guild”) (“Allgood” and “Guild” collectively
18 referred to as “Defendants”), and Nationstar Mortgage, LLC (“Nationstar”) and Federal Home
19 Loan Mortgage Corporation (“Freddie Mac”) by and through the undersigned counsel, who
20 stipulate and agree as follows, subject to the approval of the Court, as follows:

21 WHEREAS the Defendants noticed the depositions Nationstar and Freddie Mac for August
22 18, 2017 and then August 11, 2017 due to calendar conflicts.

23 WHEREAS the Defendants have re-noticed the depositions Nationstar and Freddie Mac for
24 August 21, 2017 which remain on calendar. However, counsel for Nationstar and Freddie Mac
25 have represented they are not available on August 21, 2017;
26

1 WHEREAS counsel for Nationstar and Freddie Mac has indicated that it will be unlikely
2 that Nationstar and Freddie Mac will be able to sit for deposition during the month of August 2017
3 due to already scheduled depositions and trials;

4 WHEREAS the discovery deadline for this matter is set for August 22, 2017.

5 WHEREAS Nationstar and Freddie Mac filed a motion to stay discovery [ECF No. 13],
6 which Defendants joined [ECF No. 14];

7 WHEREAS Nationstar and Freddie Mac requested Defendants re-notice the depositions for
8 a mutually agreeable date due to unavailability during the month of August, as well as the pending
9 motion to stay discovery;

10 WHEREAS Nationstar and Freddie Mac agreed that Defendants, in order to accommodate
11 the schedules of the Nationstar and Freddie Mac and their counsel, may take the depositions of
12 Nationstar and Freddie Mac on a date beyond the discovery deadline provided that the court denies
13 the pending motion to stay discovery. If the Court grants the motion to stay discovery, Nationstar
14 and Freddie Mac agree that Defendants may take the depositions of Nationstar and Freddie Mac
15 on a mutually agreeable date when and if the stay is lifted;

16 WHEREAS by executing this stipulation, Nationstar and Freddie Mac do not concede the
17 appropriateness or necessity of the deposition and this stipulation does not preclude Nationstar and
18 Freddie Mac from seeking a protective order regarding the deposition, topics, location, or date;

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1 NOW THEREFORE, subject to the approval of the Court, Defendants Allgood and Guild
2 may take the depositions of Nationstar and Freddie Mac beyond the discovery deadline in this
3 matter, on a mutually agreeable date, time and location.

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5 Dated: August 15, 2017

EARLY SULLIVAN WRIGHT
GIZER & MCRAE LLP

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7 By: s/ Scott E. Gizer
Scott E. Gizer
8 Attorneys for Summer Allgood and Guild
9 Mortgage Company

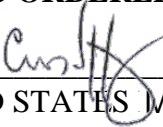
10 Dated: August 15, 2017

AKERMAN LLP

11 By: /s/ Tenesa Scaturro
12 Tenesa Scaturro, Esq.
13 Attorneys for Nationstar Mortgage, LLC and
Federal Home Loan Mortgage Corporation

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15 **IT IS SO ORDERED:**

16 
17 UNITED STATES MAGISTRATE JUDGE

18 DATED: August 16, 2017